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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

OLD HAZELDELL QUARRY, LLC,

Plaintiff,

v.

LANE COUNTY OREGON,

Defendant.

Case No. 6:22-cv-00706-AA

**STIPULATED MOTION FOR A
PROTECTIVE ORDER**

MOTION FOR A PROTECTIVE ORDER

One or more of the parties has requested the production of documents or information that at least one party considers to be or to contain confidential information and subject to protection under Federal Rule of Civil Procedure 26(c). The parties agree that good cause exists to protect the confidential nature of the information contained in documents, interrogatory responses, responses to requests for admission, or deposition testimony. This action concerns Plaintiff's constitutional takings and due process claims. The parties have exchanged and expect to further exchange documents and information that a party may consider sensitive and/or private information. The parties agree that, pursuant to the terms of the proposed Stipulated Protective

Order ("Protective Order") filed herewith, entry of the proposed Protective Order is warranted to protect against disclosure of such documents and information and hereby request entry of the Protective Order.

So stipulated:

SOKOL LARKIN

LANE COUNTY OFFICE OF
LEGAL COUNSEL

/s/ Grant N. Margeson

Grant N. Margeson, OSB #923623
Attorney for Plaintiff

/s/ Erin M Pettigrew

Erin M. Pettigrew, OSB #125100
Attorney for Defendant

CERTIFICATE OF SERVICE

I, Erin M. Pettigrew, certify that on February 16, 2024, I served the foregoing **STIPULATED MOTION FOR A PROTECTIVE ORDER** upon the parties hereto by the method indicated below and addressed to the following:

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